

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Monogram Conversions, Inc.
2404 E. Market Street & 26535 US 6 East,
Nappanee, Indiana 46550**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-13708-00349	
Original signed by Janet G. McCabe Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fabrication and assembly operation of motor homes, buses, vans, pick-up trucks and travel trailers source.

Responsible Official:	Dan Shea, President
Plant Address:	2404 E. Market Street, Nappanee, Indiana 46550; and 26535 US 6 East, Nappanee, Indiana 46550
Mailing Address:	2404 East Market Street, Nappanee, Indiana 46550
General Source Phone Number:	219-773-7761
SIC Code:	3716
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This assembly operation of motor homes, buses, vans, pick-up trucks, fifth wheel and travel trailers company consists of four (4) segments:

- (a) Segment 1, Gulf Stream Coach, Inc. (T 039-7740-00145) is located at 503 South Oakland Avenue, Nappanee, Indiana (Elkhart County),
- (b) Segment 2, Gulf Stream Coach, Inc. (T 039-7740-00145) is located at 853 South Oakland, Nappanee, Indiana (Kosciusko County),
- (c) Segment 3, Monogram Conversions, Inc. (T 039-13708-00349) is located at 2404 E. Market Street, Nappanee, Indiana (Elkhart County); and
- (d) Segment 4, Seahawk Recreational Vehicles, Inc. (part of Monogram Conversions, Inc.)(T 039-13708-00349) is located at 26535 US 6 East, Nappanee, Indiana (Elkhart County).

Gulf Stream Coach owns greater than 50% of each Monogram Conversions Inc. and Seahawk Recreational Vehicles, Inc. stationary sources. Gulf Stream Coach and Monogram Conversions, Inc. are located across the street from one another and Seahawk Recreational Vehicles, Inc. is approximately one mile from Gulf Stream Coach. Since the four (4) segments are located on adjacent properties, have the same SIC codes and Gulf Stream Coach owns greater than 50% of each Monogram Conversions Inc. and Seahawk Recreational Vehicles, Inc. sources, they will be considered one (1) source.

IDEM has determined that Segment 1 and Segment 2 Gulf Stream Coach, Inc. and Segment 3 and Segment 4 Monogram Conversions, Inc. are under the common control of Gulf Stream, Inc.. These four segments are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both Gulf Stream Coach, Inc. and Monogram Conversions, Inc.

as one source.

Separate Part 70 permits will be issued to Monogram Conversions, Inc. and Gulf Stream Coach, Inc. (039-77440-00145) solely for administrative purposes.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) fifth wheel and travel trailer assembly area, known as Plant 55 (Monogram Conversions, Inc.), installed in 1993, equipped with a cyclone, exhausted to D-555, capacity: 1.0 trailers per hour, consisting of the following:
 - (1) adhesive and cement application,
 - (2) caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray; and
 - (3) woodworking operations.
- (b) One (1) fifth wheel and travel trailer assembly area, known as Plant 59 (Seahawk Recreational Vehicles, Inc.), installed in 1993, equipped with a cyclone exhausted to D-559, capacity: 1.0 trailers per hour. consisting of the following:
 - (1) adhesive and cement application,
 - (2) caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray; and
 - (3) woodworking operations.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

One (1) touch-up painting line (without a booth, filters or designated exhaust systems). The combination HAPs from this activity are less than the 2.5 tons per year and the single HAP is less than the 1.0 ton per year insignificant threshold.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance required by the PMP shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 219-245-4870

Facsimile Number: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM,

OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit
- (c) Emergencies shall be included in the Quarterly Deviation Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by

the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit;
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) fifth wheel and travel trailer assembly area, known as Plant 55 (Monogram Conversions, Inc.), installed in 1993, equipped with a cyclone, exhausted to D-555, capacity: 1.0 trailers per hour, consisting of the following:
- (1) adhesive and cement application,
 - (2) caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray; and
 - (3) woodworking operations.
- (b) One (1) fifth wheel and travel trailer assembly area, known as Plant 59 (Seahawk Recreational Vehicles, Inc.), installed in 1993, equipped with a cyclone exhausted to D-559, capacity: 1.0 trailers per hour. consisting of the following:
- (1) adhesive and cement application,
 - (2) caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray; and
 - (3) woodworking operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input of VOC delivered to the adhesive and cement application and caulking and gluing operations applicators of Plant 55 and Plant 59 shall be limited to 26.9 tons of VOC per twelve (12) consecutive month period. This limit combined with the VOC limits in the Gulf Stream Coach, Inc. Part 70 Operating Permit will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 VOC [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC when coating plastic to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and subject the operation to the requirements of 326 IAC 8-1-6.

D.1.3 Particulate Matter (PM) Process Operations [326 IAC 6-3]

- (a) The particulate matter (PM) from the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The particulate matter (PM) from the woodworking operations of Plant 55 and Plant 59 shall be limited to 7.69 pounds per hour, each based upon a process weight rate of 5,109 pounds per wood per hour, each. These limits were calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclones shall be in operation at all times the woodworking operations of Plant 55 and Plant 59 are in operation, in order to comply with this limit.

D.1.4 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume weighted average volatile organic compound (VOC) content of coating delivered to the adhesive and cement application and caulking and gluing operations applicators at Plant 55 and Plant 59, when coating metal parts to shall be limited to three and five-tenths (3.5) pounds of VOC per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 are in compliance with this requirement. The source shall comply with this rule by limiting the VOC content on a daily basis. The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

lbVOC/gal less water =

$$\frac{3 \text{ coats} [\text{density lb / gal} \times \text{wt \% organics} \times \text{gal of mat'l, gal / unit} / (1 - \% \text{ vol water}) \times \frac{(\text{density coat, lb / gal})}{(\text{density water, lb / gal})}]}{(3 \text{ coats, gal / unit})}$$

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

D.1.6 VOC [326 IAC 8-2-12]

The requirement from CP 039-4842-00349, issued on February 12, 1996, Condition 12 was as follows:

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings that contain volatile organics that are applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

Airless Spray Application
Air-Assisted Airless Spray Application
[Includes High-Volume Low-Pressure HVLP]
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High-volume low-pressure (HVLP) spray means technology used to applied coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The requirements of 326 IAC 8-2-12 do not apply to Plant 55 and Plant 59 because structural wood building parts are being coated not wood furniture. Thus Condition 12 of CP 039-4842-00349, issued on February 12, 1996 is hereby rescinded.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

The cyclones for PM control shall be in operation and control emissions from the woodworking operations of Plant 55 and Plant 59 at all times when the woodworking operations of Plant 55 and Plant 59 are in operation.

D.1.10 Visible Emissions Notations

- (a) Daily visible emission notations of the D-555 and D-559 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.11 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.12 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of either the MSDSs demonstrating the use of compliant coatings or if noncompliant coatings are used, records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use; and

- (3) The volume weighted VOC content of the coatings used for each day.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the D-555 and D-559 stack exhaust.
- (d) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

One (1) touch-up painting line (without a booth, filters or designated exhaust systems). The combination HAPs from this activity are less than the 2.5 tons per year and the single HAP is less than the 1.0 ton per year insignificant threshold.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) Process Operations [326 IAC 6-3]

The particulate matter (PM) from the touch-up painting line shall be limited to the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where, } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Monogram Conversions, Inc.
Source Address: 2404 E. Market Street, Nappanee, Indiana 46550; and
26535 US 6 East, Nappanee, Indiana 46550
Mailing Address: 2404 East Market Street, Nappanee, Indiana 46550:
Part 70 Permit No.: T 039-13708-00349

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Monogram Conversions, Inc.
Source Address: 2404 E. Market Street, Nappanee, Indiana 46550; and
26535 US 6 East, Nappanee, Indiana 46550
Mailing Address: 2404 East Market Street, Nappanee, Indiana 46550:
Part 70 Permit No.: T 039-13708-00349

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ☐ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Monogram Conversions, Inc.
Source Address: 2404 E. Market Street, Nappanee, Indiana 46550; and
26535 US 6 East, Nappanee, Indiana 46550
Mailing Address: 2404 East Market Street, Nappanee, Indiana 46550:
Part 70 Permit No.: T 039-13708-00349
Facility: Plant 55 and Plant 59
Parameter: VOC
Limit: 26.9 tons of VOC per consecutive twelve (12) month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION REPORT**

Source Name: Monogram Conversions, Inc.
Source Address: 2404 E. Market Street, Nappanee, Indiana 46550; and
26535 US 6 East, Nappanee, Indiana 46550
Mailing Address: 2404 East Market Street, Nappanee, Indiana 46550:
Part 70 Permit No.: T 039-13708-00349

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Monogram Conversions, Inc.
Source Location: 2404 E. Market Street, Nappanee, Indiana 46550; and
26535 US 6 East, Nappanee, Indiana 46550
County: Elkhart
SIC Code: 3716
Operation Permit No.: T 039-13708-00349
Permit Reviewer: Paula M. Cognitore

On July 16, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Monogram Conversions, Inc. had applied for a Part 70 Operating Permit to operate a fabrication and assembly operation of motor homes, buses, vans, pick-up trucks and travel trailers with cyclones for PM control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On August 30, 2001, Mary Ann. F. Saggese, Esq. of Plews Shadely Racher & Braun on behalf of Monogram Conversions, Inc. submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Condition C.21(a), General Reporting Requirements

A typographical error should be corrected in paragraph (a) in the fourth sentence where the word "and" should be deleted from the report title "Quarterly Deviation ~~and~~ Report"

Response 1:

The following change has been made to Condition C.21(a):

- (a) The source shall submit the attached Quarterly Deviation Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation ~~and~~ Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 2:

Condition D.1.2, VOC

To clarify the meaning of the condition the first sentence should be revised as follows:

"Any change or modification which would increase the potential to emit VOC ~~on~~ *when coating* plastic to ...".

Response 2:

The following change has been made to Condition D.1.2:

Any change or modification which would increase the potential to emit VOC ~~on~~ **when coating** plastic to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and subject the operation to the requirements of 326 IAC 8-1-6.

Comment 3:

Condition D.1.13(a), and (b), Record Keeping Requirements

- (a)(3) Monogram and Seahawk recycle and reuse their cleanup solvent. Approximately 90-95% of the cleanup solvents are reclaimed, reused and then recycled repeatedly. The remaining approximately 5-10% of clean-up solvents which are unreclaimed are stored as hazardous waste in covered drums and then disposed by a hazardous waste contractor. Therefore, it is not appropriate to track the cleanup solvent usage for each month. This Condition D.1.13 (a)(2) should instead require the recording of "clean-up solvent unreclaimed for each month."
- (b) Compliance with Condition D.1.4 pursuant to Condition D.1.13(b) is solely based on a daily limit of pounds of VOC per gallon of coating. Therefore, the only applicable record keeping requirements would be items (1), (2), and (3). Compliance with D.14 is not demonstrated by "(4) the total VOC usage for each day" and it should be deleted from this record keeping requirement.

Response 3:

IDEM, OAQ is concerned with emission limits of actual emissions. When IDEM, OAQ requires that a source report solvent usage IDEM, OAQ requires the amount of solvent lost to evaporation (used), not the throughput of solvent in the process, recycled solvent or solvent disposed of as hazardous waste.

A source with multiple solvent cleaning containers that can not feasibly track solvent loss should track new solvent that is introduced to the system. For example if the source fills the cleaning stations with a gallon of solvent on Monday and again on Thursday, then 2 gallons of solvent are used that week. In either case, the fact that the source had 50 gallons of cleaning solvent that passed through gun cleaners 10 times a day, is irrelevant. Therefore with this clarification of what the word "usage" means no changes have been made to the permit.

Since compliance with Condition D.1.4 is solely based on a daily volume weighted VOC content limit in pounds of VOC per gallon of coating, the total VOC for each day is not needed. Therefore, the following change has been made to Condition D.13(b):

D.1.13 Record Keeping Requirements

- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of either the MSDSs demonstrating the use of compliant coatings or if noncompliant coatings are used, records in accordance with (1) through ~~(4)~~ below. Records maintained for (1) through ~~(4)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS)

necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use; **and**
- (3) The volume weighted VOC content of the coatings used for each day.; ~~and~~
- (4) ~~The total VOC usage for each day.~~

Comment 4

TSD, Page 2-3 of 13, Insignificant Activities

Monogram and Gulf Stream Coach have been using outside vendors to paint their units and upon the unit's return additional permitted work is performed which may cause the unit to require touch-up painting on line (without a booth, filters or designated exhaust systems). The touch-up painting has potential emissions which meet the requirements for an insignificant activity as demonstrated on the attached spreadsheets. The combination HAPs from this activity are less than the 2.5 TPY insignificant threshold and the single HAP is less than the 1 TPY insignificant threshold. We request that touch-up painting for miscellaneous motor homes, buses, vans, pick-up trucks, or travel trailers be added to the insignificant activities list for this permit (as well as the Gulf Stream Coach permit).

Response 4

The addition of the touch-up painting line as an insignificant activity has been added to the permit. Since there is some particulate matter emissions from the touch-up painting 326 IAC 6-3-2 has been added to the permit for this insignificant activity. The following changes have been made to the permit:

- A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source ~~does not currently have any~~ **also includes the following** insignificant activities **which are specifically regulated**, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

One (1) touch-up painting line (without a booth, filters or designated exhaust systems). The combination HAPs from this activity are less than the 2.5 tons per year and the single HAP is less than the 1.0 ton per year insignificant threshold.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

One (1) touch-up painting line (without a booth, filters or designated exhaust systems). The combination HAPs from this activity are less than the 2.5 tons per year and the single HAP is less than the 1.0 ton per year insignificant threshold.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) Process Operations [326 IAC 6-3]

The particulate matter (PM) from the touch-up painting line shall be limited to the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where, } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

Although there are no changes made to the Technical Support Document the insignificant activity list has been updated as follows:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:

Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (g) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (h) **One (1) touch-up painting line (without a booth, filters or designated exhaust systems). The combination HAPs from this activity are less than the 2.5 tons per year, a single HAP is less than the 1.0 ton per year and VOC emissions are less than 3.0 pounds per hour or 15.0 pounds per day insignificant thresholds.**

Comment 5:

TSD, Appendix A, Emission Calculations

Monogram has made three revisions/updates to the raw materials used which should be corrected as applicable to the emission spreadsheets found in Appendix A, as follows:

1. Plant 55 & 59 Floors: Mor-Ad M-511 has been replaced with Mor-Ad M-523 (MDI and PMDI are not emitted per the manufacturer.)
2. Plant 55 & 59 Floors: The Gloss Black Aerosol Paint has been replaced with one with slightly different density etc.
3. Plant 55 & 59 Chassis Prep/ Floors: The emission calculations for Enerfoam 43 were corrected to show that PMDI is not emitted per the manufacturer.

Response 5:

Although the source has made changes that include the addition, deletion and revision of materials used in Plant 55 & 59 it is not necessary to update the Appendix A spreadsheets. The Appendix A spreadsheets can remain unchanged because the source has agreed to limit the VOC emissions from Plant 55 & 59 to 26.9 tons per. Therefore are no changes to the permit as a result of the updated and revised material safety data sheets.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition D.1.11 had been changed as follows:

D.1.11 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the ~~adhesive and cement application, caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray operation~~ **woodworking operations** when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

Change 2:

Condition B.8 (Compliance with Permit Conditions) has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act as follows:

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:~~
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) **Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**

- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Change 3:

Compliance Branch has been changed to Compliance Data Section where appropriate in the permit.

Change 4:

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. Condition B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations. The changes are as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached ~~Quarterly Deviation and Compliance Monitoring Report~~, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~
 - (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation ~~and Compliance Monitoring Report.~~

Change 5:

Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised Condition C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised Condition C.18 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

The documents submitted pursuant to this condition ~~does not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the Internet at <http://www.state.in.us/idem/air/rules/apcb/packets/index.html>. The rule revisions were published in the February 1, 2002 Indiana Register which can be found on the Internet at <http://www.IN.gov/legislative/register/index-25.html>.

Change 6:

Condition B.2 has had the rule cite 326 IAC 2-1.1-9.5 added to include the new promulgated rule which clarifies when permits expire and when conditions in previous issued permits are superseded as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Change 7:

Condition B.12 Emergency Provisions (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology-based emission limitations only. The condition is changed as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
 - (1) ~~If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
 - (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
 - (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
 - (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

Change 8:

Condition B.14 Multiple Exceedances has been deleted because 326 IAC 2-7-5(1)(E) has been repealed since it conflicted with 40 CFR 70.6(a)(6) as follows:

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

Change 9:

Condition B.14 Prior Permits Superseded was added to the proposed permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 as follows:

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

Change 10:

Paragraph (b) of Condition B.13 Permit Shield has been deleted because this paragraph is no longer necessary due to the addition of the new Condition B.14 Prior Permits Superseded as follows:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- ~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

Change 11:

The IDEM, OAQ has restructured Condition C.17 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications. References to this condition throughout the proposed permit have been revised to reflect the name change of this condition. The changes are as

C.17 Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the~~

~~documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- ~~(5) A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ;. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, and maintained on site, and is comprised of:~~

~~(A)(1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit;~~

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows: Failure to take reasonable response steps may constitute a violation of the permit.

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(1) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (2) **Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Monogram Conversions, Inc.
Source Location:	2404 E. Market Street, Nappanee, Indiana 46550; and 26535 US 6 East, Nappanee, Indiana 46550
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	T 039-13708-00349
Permit Reviewer:	Paula M. Cognitore

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Gulf Stream Coach, Inc. which includes Monogram Conversions, Inc. (which includes Seahawk Recreational Vehicles, Inc) (T 039-13708-00349) relating to the fabrication and assembly operation of motor homes, buses, vans, pick-up trucks and travel trailers.

Source Definition

This assembly operation of motor homes, buses, vans, pick-up trucks, fifth wheel and travel trailers company consists of four (4) segments:

- (a) Segment 1, Gulf Stream Coach, Inc. (T 039-7740-00145) is located at 503 South Oakland Avenue, Nappanee, Indiana (Elkhart County),
- (b) Segment 2, Gulf Stream Coach, Inc. (T 039-7740-00145) is located at 853 South Oakland, Nappanee, Indiana (Kosciusko County),
- (c) Segment 3, Monogram Conversions, Inc. (T 039-13708-00349) is located at 2404 E. Market Street, Nappanee, Indiana (Elkhart County); and
- (d) Segment 4, Seahawk Recreational Vehicles, Inc. (part of Monogram Conversions, Inc.) (T 039-13708-00349) is located at 26535 US 6 East, Nappanee, Indiana (Elkhart County).

Gulf Stream Coach owns greater than 50% of each Monogram Conversions Inc. and Seahawk Recreational Vehicles, Inc. stationary sources. Gulf Stream Coach and Monogram Conversions, Inc. are located across the street from one another and Seahawk Recreational Vehicles, Inc. is approximately one mile from Gulf Stream Coach. Since the four (4) segments are located on adjacent properties, have the same SIC codes and Gulf Stream Coach owns greater than 50% of each Monogram Conversions Inc. and Seahawk Recreational Vehicles, Inc. sources, they will be considered one (1) source.

IDEM has determined that Segment 1 and Segment 2 Gulf Stream Coach, Inc. and Segment 3 and Segment 4 Monogram Conversions, Inc. are under the common control of Gulf Stream, Inc.. These four segments are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both Gulf Stream Coach, Inc. and Monogram Conversions, Inc. as one source.

Separate Part 70 permits will be issued to Monogram Conversions, Inc. and Gulf Stream Coach, Inc. (039-77440-00145) solely for administrative purposes.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) fifth wheel and travel trailer assembly area, known as Plant 55 (Monogram Conversions, Inc.), installed in 1993, equipped with a cyclone, exhausted to D-555, capacity: 1.0 trailers per hour, consisting of the following:
 - (1) adhesive and cement application,
 - (2) caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray; and
 - (3) woodworking operations.
- (b) One (1) fifth wheel and travel trailer assembly area, known as Plant 59 (Seahawk Recreational Vehicles, Inc.), installed in 1993, equipped with a cyclone exhausted to D-559, capacity: 1.0 trailers per hour. consisting of the following:
 - (1) adhesive and cement application,
 - (2) caulking and gluing on floors, walls, windows and roofs, methods of application include brush, caulk gun and aerosol spray; and
 - (3) woodworking operations.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (d) The following VOC and HAP storage containers:

Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (g) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

CP 039-4842-00349, issued on February 12, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 039-4842-00349, issued on February 12, 1996

Condition 6: That pursuant to 326 IAC 6-3 (Process Operations), the two (2) cyclone dust collectors shall be in operation at all times when woodworking is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 1.74 and 2.61 pounds per hour for Buildings 55 and 59, respectively. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

Reason not incorporated: This condition has not been carried through because the process weight rates for Plant 55 and Plant 59 have changed; therefore, new 326 IAC 6-3-2 allowables must be calculated.

- (b) CP 039-4842-00349, issued on February 12, 1996

Condition 12: That pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings that contain volatile organics that are applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

Airless Spray Application
Air-Assisted Airless Spray Application
[Includes High-Volume Low-Pressure HVLP]
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High-volume low-pressure (HVLP) spray means technology used to applied coating to a substrate by means of coating application equipment which operates between one-tenth

(0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Reason not incorporated: The requirements of 326 IAC 8-2-12 do not apply to Plant 55 and Plant 59 because structural wood building parts are being coated not wood furniture.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for Gulf Stream Coach, Inc. was received on December 16, 1996. Additional information received on, December 26, 2000 stated that Monogram Coach, Inc. should be incorporated into the Gulf Stream Coach, Inc. Part 70 permit. Additional information was received on and January 12, 2001 and February 13, 2001.

Emission Calculations

See pages 1 through 3 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Monogram Conversions, Inc. & Seahawk Recreational Vehicles, Inc.

Pollutant	Potential To Emit (tons/year)
PM	27.3
PM ₁₀	27.3
SO ₂	0.00
VOC	55.7
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the

regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Toluene	13.9
MEK	7.47
MIBK	0.812
Xylene	0.677
MDI	13.4
PMDI	7.14
Methylene Chloride	0.001
Ethyl Benzene	0.373
TOTAL	43.8

Gulf Stream Coach, Inc.

Pollutant	Potential To Emit (tons/year)
PM	227
PM ₁₀	227
SO ₂	0.00
VOC	930
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
MDI	0.168
Toluene	155
MEK	36.3
Methylene Chloride	0.001
Hexane	0.234
Xylene	150
Ethyl Benzene	3.13

MIBK	29.1
TOTAL	374

Total Emissions

Pollutant	Potential To Emit (tons/year)
PM	254
PM ₁₀	254
SO ₂	0.00
VOC	986
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Toluene	169
MEK	43.8
MIBK	29.9
Xylene	151
MDI	13.6
PMDI	7.14
Methylene Chloride	0.002
Ethyl Benzene	3.50
Hexane	0.234
TOTAL	418

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ and VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from Monogram Conversions, Inc. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not listed
PM ₁₀	0.0005
SO ₂	0.0009
VOC	10.7
CO	0.03
NO _x	not listed
HAP	not listed

The following table shows the actual emissions from Gulf Stream Coach, Inc. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.014
PM ₁₀	0.014
SO ₂	0.006
VOC	30.5
CO	0.210
NO _x	not listed
HAP (specify)	not listed

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Monogram							
Plant 55	2.14	2.14	0.00	***	0.00	0.00	***
Plant 59	2.14	2.14	0.00	***	0.00	0.00	***

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
				***26.9			***21.2
D-555	0.270	0.270	0.00	0.00	0.00	0.00	0.00
D-559	0.976	0.976	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.0	5.0	1.0	2.0	3.0	3.0	1.0
Gulf Stream							
Booth 1	0.758	0.758	0.00	*	0.00	0.00	*
Booth 2	0.758	0.758	0.00	*	0.00	0.00	*
Booth 3	0.758	0.758	0.00	*	0.00	0.00	* Single < 10.0 Combination < 25.0
Booth 4	0.006	0.006	0.00	*	0.00	0.00	*
Booth 5	0.006	0.006	0.00	*	0.00	0.00	*
				*129			*32.6
Wood 51	2.63	2.63	0.00	0.00	0.00	0.00	0.00
Wood 52/58	2.63	2.63	0.00	0.00	0.00	0.00	0.00
Assembly 51	14.3	14.3	0.00	**	0.00	0.00	**
Assembly 52/58	9.4	9.4	0.00	**	0.00	0.00	**
Lam 1 and Lam 2	69.1	69.1	0.00	**	0.00	0.00	**
				**71.0			**42.5
Insignificant Activities	5.0	5.0	1.0	2.0	3.0	3.0	1.0
Total Emissions	116	116	2.0	231	6.0	6.0	98.3

*Pursuant to CP 039-9271-00145, issued December 23, 1998, Booth 1 through Booth 5 are limited to 129 tons of VOC per twelve (12) consecutive months to satisfy the requirements of 326 IAC 8-1-6. The HAPs from these facilities have been ratioed to reflect the VOC limit.

**The source has requested that Assembly 51, Assembly 52/58, Lam 1 and Lam 2 be limited to 71.0 tons of VOC per twelve (12) consecutive months. The HAPs from these facilities have been ratioed to reflect the VOC limit.

***The source has requested that Plant 55 and Plant 59 be limited to 26.9 tons of VOC per twelve (12) consecutive months. The HAPs from these facilities have been ratioed to reflect the VOC limit.

The above VOC limits make the requirements of 326 IAC 2-2 not applicable.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for

Hazardous Air Pollutants (NESHAPs) Subpart JJ since the source does not manufacture any products in the SIC codes listed in the definition of wood furniture. The wood components manufactured at this source are structural and are not considered furniture.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source has agreed to limit their VOC emissions from the entire source to less than 250 tons per year. The VOC emissions from the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 are limited to 26.9 tons per year. This limit combined with the VOC limits in the Gulf Stream, Inc. Part 70 Operating Permit, Inc will make the requirements of 326 IAC 2-2 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New source toxics control)

The HAP emissions from the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 are each greater than ten (10) tons per year of a single HAP and/or twenty-five (25) tons of any combination of HAPs. These facilities were constructed before the July 17, 1997 applicability date; therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The particulate matter (PM) from the woodworking operations of Plant 55 and Plant 59 shall be limited to 7.69 pounds per hour, each based upon a process weight rate of 5,109 pounds per wood per hour, each. These limits were calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \\ \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclones shall be in operation at all times the woodworking operations of Plant 55 and Plant 59 are in operation, in order to comply with this limit.

326 IAC 8-1-6 (Best Available Control Technology)

The adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 have the potential to emit more than twenty-five (25) tons per year of VOC, when coating metal, wood and plastic. Therefore, 326 IAC 8-1-6 could be applicable. Since the total VOC potential emissions from only coating plastic is less than 25.0 tons per year the requirements of 326 IAC 8-1-6 are not applicable.

Any change or modification which would increase the potential to emit VOC on plastic to twenty-five tons per year or more, shall obtain prior approval from IDEM, OAQ.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume weighted average volatile organic compound (VOC) content of coating delivered to the adhesive and cement application and caulking and gluing operations applicators at Plant 55 and Plant 59, when coating metal parts to shall be limited to three and five-tenths (3.5) pounds of VOC per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 are in compliance with this requirement. The source shall comply with this rule by limiting the VOC content on a daily basis. The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

lbVOC/gal less water =

$$\frac{3 \text{ coats } [\text{density lb / gal} \times \text{wt \% organics} \times \text{gal of mat'l, gal / unit} / (1 - \% \text{ vol water})] \times \frac{(\text{density coat, lb / gal})}{(\text{density water, lb / gal})}}{(3 \text{ coats, gal / unit})}$$

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The requirements of 326 IAC 8-2-12 do not apply to the adhesive and cement application and caulking and gluing operations of Plant 55 and Plant 59 because structural wood building parts are being coated not wood furniture.

Testing Requirements

There are no testing requirements in this permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Daily visible emissions notations of the woodworking operations of Plant 55 and Plant 59 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) An inspection shall be performed each calendar quarter of all cyclones controlling the wood-working operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

These monitoring conditions are necessary because the cyclones must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this operation of fifth wheel and travel trailers. shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 039-13708-00349.**

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Page 1 of 3 TSD App A

Company Name: Monogram Conversions, Inc.
Address City IN Zip: 2404 E. Market Street & 26535 US 6 East, Nappanee, Indiana 46550
Part 70: 039-13708
PIt ID: 039-00349
Reviewer: Paula M. Cognitore
Date: December 16, 1996

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Material Coated	Transfer Efficiency
Plant 55 and 59																	
Floors																	
Pipe Dope	11.74	64.00%	41.0%	23.0%	41.0%	59.00%	0.00606	1.000	4.58	2.70	0.02	0.39	0.07	0.00	4.58	Metal	100%
ABS Yellow Cement	7.08	75.00%	0.0%	75.0%	0.0%	35.00%	0.06000	1.000	5.31	5.31	0.32	7.65	1.40	0.00	15.17	Plastic	100%
ABS Black Cement	6.66	75.00%	0.0%	75.0%	0.0%	35.00%	0.10000	1.000	5.00	5.00	0.50	11.99	2.188	0.00	14.27	Plastic	100%
ABS Cleaner	6.75	100.00%	0.0%	100.0%	0.0%	0.00%	0.01200	1.000	6.75	6.75	0.08	1.94	0.35	0.00	ERR	Plastic	100%
502 Silicone	8.59	0.00%	0.0%	0.0%	0.0%	100.00%	0.69000	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Metal	100%
Enerfoam 43	10.00	0.00%	0.0%	0.0%	0.0%	100.00%	0.00160	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Frame	100%
Mor Ad M511	9.25	0.00%	0.0%	0.0%	0.0%	100.00%	1.18000	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Metal	100%
Sta Put 2001M	5.91	75.00%	0.0%	75.0%	0.0%	25.00%	0.13000	1.000	4.43	4.43	0.58	13.83	2.52	0.00	17.73	Wood, Carpet, Metal	100%
Silicone Spray	9.55	64.00%	59.0%	5.0%	44.0%	41.00%	0.09600	1.000	0.85	0.48	0.05	1.10	0.20	0.72	1.16	Wood	50%
Gloss Black Paint	6.78	68.40%	0.0%	68.4%	0.0%	0.01%	0.28500	1.000	4.64	4.64	1.32	31.72	5.79	1.34	46368.42	Metal	50%
Shelling																	
JAWS 9200	13.86	8.00%	0.0%	8.0%	0.0%	85.00%	0.45000	1.000	1.11	1.11	0.50	11.98	2.19	0.00	1.30	Aluminum, Wood	100%
8011 Adhesive1015 Roof Adhesive	8.34	42.00%	42.0%	0.0%	42.0%	58.00%	0.87000	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Wood, Metal	100%
1016 Self Leveling Sealant	9.10	34.00%	12.0%	22.0%	12.0%	50.40%	1.07000	1.000	2.28	2.00	2.14	51.41	9.38	0.00	3.97	Metal	100%
Pro 2000 Sealant	8.00	30.00%	0.0%	30.0%	0.0%	70.00%	0.34000	1.000	2.40	2.40	0.82	19.58	3.57	0.00	3.43	Metal	100%
Anti Wicking 724B	11.49	27.00%	26.9%	0.1%	36.5%	63.53%	0.11000	1.000	0.02	0.01	0.00	0.04	0.01	0.00	0.02	Wood	100%
Sikaflex 227	9.80	2.80%	0.0%	2.8%	0.0%	95.00%	0.02900	1.000	0.27	0.27	0.01	0.19	0.03	0.00	0.29	Metal	100%
Final Finish																	
Spot Shot	8.14	89.00%	64.0%	25.0%	59.0%	11.00%	0.00606	1.000	4.96	2.04	0.01	0.30	0.05	0.01	18.50	Carpet	50%
Insta Buff	8.04	74.00%	56.0%	18.0%	54.0%	5.16%	0.01500	1.000	3.15	1.45	0.02	0.52	0.10	0.07	28.05	Everything	50%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled

6.36

153

27.9

2.14

METHODOLOGY

Plant 55 & 59

12.7

305

55.7

4.28

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

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Company Name: Monogram Conversions, Inc.
Address City IN Zip: 2404 E. Market Street & 26535 US 6 East, Nappanee, Indiana 46550
Part 70: 039-13708
Plt ID: 039-00349
Reviewer: Paula M. Cognitore
Date: December 16, 1996

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % MEK	Weight % MIK	Weight % Xylene	Weight % MDI	Weight % PMDI	Weight % Methylene Chloride	Weight % Ethyl Benzene	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Xylene Emissions (tons/yr)	MDI Emissions (tons/yr)	PMDI Emissions (tons/yr)	Methylene Chloride (tons/yr)	Ethyl Benzene (tons/yr)
Plant 55 and 59																			
Floors																			
Pipe Dope	11.74	0.00606	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS Yellow Cement	7.08	0.06000	1.000	0.00%	75.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.40	0.00	0.00	0.00	0.00	0.00
ABS Black Cement	6.66	0.10000	1.000	0.00%	68.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.98	0.00	0.00	0.00	0.00	0.00	0.00
ABS Cleaner	6.75	0.01200	1.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.35	0.00	0.00	0.00	0.00	0.00	0.00
502 Silicone	8.59	0.69000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Enerfoam 43	10.00	0.00160	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	45.00%	0.50%	0.00%	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00
Mor Ad M511	9.25	1.18000	1.000	0.00%	0.00%	0.00%	0.00%	14.00%	7.40%	0.00%	0.00%	0.00	0.00	0.00	0.00	6.69	3.54	0.00	0.00
Sta Put 2001M	5.91	0.13000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Silicone Spray	9.55	0.09600	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gloss Black Paint	6.78	0.28500	1.000	0.00%	0.00%	4.80%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.41	0.34	0.00	0.00	0.00	0.00
Shelling																			
JAWS 9200	13.86	0.45000	1.000	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8011 Adhesive1015 Roof Adhesive	8.34	0.87000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1016 Self Leveling Sealant	9.10	1.07000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pro 2000 Sealant	8.00	0.34000	1.000	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Anti Wicking 724B	11.49	0.11000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sikaflex 227	9.80	0.02900	1.000	0.00%	0.00%	0.00%	5.00%	1.00%	0.00%	0.00%	15.00%	0.00	0.00	0.00	0.06	0.01	0.00	0.00	0.19
Final Finish																			
Spot Shot	8.14	0.00606	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insta Buff	8.04	0.01500	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Individual HAP Emissions (tons/yr)	6.95	3.73	0.406	0.339	6.69	3.57	0.0004	0.187
Total HAPS Emissions (tons/yr)	21.9							
Plant 55 & 59								
Individual HAP Emissions (tons/yr)	13.9	7.47	0.812	0.677	13.4	7.14	0.001	0.373
Total HAPS Emissions (tons/yr)	43.8							

Appendix A: Emission Calculations Cyclone Operations

Company Name: Monogram Conversions, Inc.
Address City IN Zip: 2404 E. Market Street & 26535 US 6 East, Nappanee, Indiana 46550
Title V: 039-13708
Plt ID: 039-00349
Reviewer: Paula M. Cognitore
Date: December 16, 1996

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
D-555	96.0%	0.002	3600.0	1.54	6.76	0.062	0.270
D-559	94.0%	0.005	5200.0	3.71	16.3	0.223	0.976

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Unit ID	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
D-555	5109	2.55	7.69
D-559	5109	2.55	7.69

Methodology

Allowable Emissions = $4.10(\text{Process Weight Rate})^{0.67}$

Process Weight Rates were taken from CP 039-2714-00145